

REMARKS

Claims 1-27 are pending in this application. Claim 12 is cancelled without prejudice or disclaimer, claims 1-5, 8-9, 11, 13-20 and 22-27 are amended, and claim 28 is added herein.

The Examiner's consideration of the supplemental IDS and restarting of the response clock, as documented in the Official Action of June 18, 1999 is noted with appreciation.

The specification is amended to correct obvious editorial errors. No new matter is added.

The declaration of inventor Kight is objected to because the typed residential address on the originally filed Declaration was changed without the inventor initialing and dating the change. A Supplemental Declaration and Power of Attorney executed by inventor Kight is submitted herewith to overcome the objection.

Claims 5, 19 and 27 stand rejected under 35 USC § 112, second paragraph, as indefinite. Claims 5, 19 and 27 are amended to eliminate the language which the Examiner finds objectionable and to further clarify the claim recitals.

Claims 1-4, 8-9, 11, 13-18, 20, and 22-26 are also amended solely for clarification and not to overcome the prior art rejections which will be addressed in detail below.

The Examiner rejects claims 1-4, 6-18 and 20-26 under 35 USC § 103(a) as obvious over Kight et. al. (U.S. Patent No. 5,383,113) in view of Pintsov et al. (U.S. Patent No. 5,612,889). No prior art is applied against claims 5, 19 and 27. The rejection is respectfully traversed.

As understood, the Examiner acknowledges that Kight fails to disclose processing the payment information, other than a received zip code, to identify an eleven digit zip code which is used to access a database to locate or retrieve a payee record having a corresponding associated zip code, as recited in independent claims 1, 11, and 16. The Examiner points to Pintsov (column 7, lines 49-52) as teaching the processing of mail information to identify an eleven digit zip code. On this basis, the Examiner contends that it was obvious to process payment information to identify an eleven digit zip code and, as understood, to access or retrieve a payee record based on the identified zip code.

Contrary to the Examiner's position, it is respectfully submitted that Pintsov lacks any disclosure of processing payment information (excluding a received zip code) to identify a correct zip code which is used to access a record. Rather, what Pintsov does disclose in the referenced text is altering the stored zip code due to an address change. Hence, Pintsov's alterations could be used in conjunction with present invention to update the merchant database, but clearly fails to make obvious the recited processing of information to identify a zip code which is used to access a record.

Further, Pintsov is directed to a mail system for securely protecting the payment to the carrier service by insuring that the carrier service authorizes mail prior to its actual deposit into the postal stream. Each mail piece is marked with a mail piece ID 306 (see Figure 6) other than the zip code, which is used in the authorization process. As disclosed in column 12, lines 51+, the unique mail piece ID is used to access the correct mailing

identification file to, as discussed in column 13, lines 8-15, retrieve the extended zip code. As discussed in column 13, lines 22-26, the zip code is then printed on the mail piece as indicated by 1002 of Figure 10 (see column 13, lines 27-30).

Hence, the applied combination lacks any teaching or suggestion of using a zip code, which is identified by processing information excluding a received zip code, to locate or retrieve a file or record which has an associated corresponding zip code. Rather, the combination at best discloses is using a unique ID other than the zip code to access a stored payee record to obtain a zip code and printing the zip code on a piece of mail, and, if appropriate, to access a stored payee change of address record to obtain a changed zip code and substituting the changed zip code for the original zip code in the stored payee record.

Accordingly, it is respectfully requested that the rejection of claim 1 and its dependencies (i.e. claims 2-9), claim 11 and its dependencies (i.e. claims 12-15) and claim 16 and its dependencies (i.e. claims 17-21) be reconsidered and withdrawn.

With regard to independent claims 10 and 22, the Examiner points to Pintsov (column 13, lines 55-59) as making obvious the recited processing to identify an eleven digit zip code in order to deliver payment to the correct entity regardless of changes in the entity's address.

It is respectfully submitted that, contrary to the Examiner's position, Pintsov lacks any teaching or suggestion of using the identified zip code to access a database as recited. Rather, as discussed above, Pintsov

uses a unique identifier, different than the zip code, to access files.

The Examiner points to Pintsov as disclosing a unique code that identifies an eleven digit delivery address (citing column 11, lines 26-29 and 49-51), and asserts, without providing any supporting rationale, that in view of this teaching it was obvious to use an eleven digit zip code to access payee records because the code identifies where the payment should be made and is associated with a specific payee. However, as noted above, Pintsov lacks any teaching or suggestion whatsoever of using a zip code to access records. Rather, Pintsov teaches accessing records using a unique code (different than the zip code) to obtain the zip code and therefore teaches against accessing records using a zip code.

Hence, the applied combination of references at best teach or suggest accessing a stored payee record to obtain a zip code using a unique ID other than the zip code and, to the extent appropriate, accessing a stored payee change of address record to obtain a changed zip code using this unique ID and substituting the changed zip code for the original zip code in the stored payee record. The applied art also lacks any teaching or suggestion of using the name, city and state to identify the zip code.

Accordingly, it is respectfully requested that the rejection of claim 10 and claim 22 and its dependencies (i.e. claims 23-27) be reconsidered and withdrawn.

Other features recited in the dependent claims of the present application are believed to further independently distinguish over the applied art combination. For example, with respect to claims 8, 14 and 20, the Examiner points to Kight (column 3, lines 4-9) as disclosing verifying an

account number and transforming the verified account number. However, Kight's disclosure in referenced text relates to verifying a bank account number and not to verifying a merchant account number as recited in the present claims. The Examiner acknowledges that Kight fails to teach validation rules but points to Pintsov (column 10, lines 61-65, column 11, lines 56-67, and column 12, lines 1-4) as teaching a unique identifier with an error correction code and a validation process. However, Pintsov fails to disclose what the referenced error correction code is used for. Pintsov does disclose a simple encryption validation process but lacks any teaching or suggestion whatsoever of validating an account number based on validation rules corresponding to payee values for fields of the account number.

With regard to claims 9, 15, 21 and 24, the Examiner acknowledges that Kight fails to teach identifying one of a plurality of remittance centers. The Examiner points to Pintsov (column 11, lines 39-51) as disclosing the use of a zip code to identify a single delivery point to which delivery is directed. However, Pintsov lacks any disclosure of using a merchant account number to identify one of a plurality of different delivery points associated with a single entity as recited.

With regard to claim 23, the Examiner further acknowledges that Kight fails to disclose transformation of an account number based upon alteration rules. The Examiner points to Pintsov (column 10, lines 61-65 and column 7, lines 49-52) as teaching a unique identification number having a specific format and transforming mail address codes into new delivery point postal codes. On this basis the Examiner contends it was obvious to format account

numbers in accordance with alteration rules in order to make sure that the payment is from the correct payer. The Examiner's rationale is not understood.


Pintsov lacks any disclosure of altering the unique identification number. What Pintsov does disclose is altering the zip code due to an address change. Hence, as discussed above, Pintsov's alterations could be used in conjunction with the present invention to update the merchant database, but clearly fail to make obvious the recited alteration of the account number.

New claim 28 is added to recite the invention in a somewhat different manner. It is respectfully submitted that the applied art combination lacks any teaching or suggestion of various features recited in new claim 28, including the recited alternative basis for directing payment.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0427 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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